

January 21, 2004  
Docket No.: DP-301665 (7500/249)  
Serial No.: 10/052,240  
Filed: January 17, 2002  
Page 7

**-- REMARKS --**

Claims 29-49 remain under consideration. The claims have been amended, not to limit their breadth, or to claim around the references, but rather the claims have been amended to more clearly point out the invention.

**A. Claims 15-28 were rejected as indefinite under 35 U.S.C. §112 second paragraph.**

The rejection of claims 15-28 as indefinite is traversed. Claims 15-28 have been cancelled, obviating the Examiners rejection.

Withdrawal of the rejections to claims 15-28 under 35 USC 112 is requested.

**B. Claims 15-20 were rejected under 35 USC §103(a) as unpatentable over Endo or Levrai in view of Suzuki.**

The rejection of claims 15-20 under 103(a) as unpatentable over Endo or Levrai in view of Suzuki is traversed.

Claims 15-20 have been cancelled, obviating the Examiners rejection. Withdrawal of the rejections to claims 15-20 is requested.

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January 21, 2004

Docket No.: DP-301665 (7500/249)

Serial No.: 10/052,240

Filed: January 17, 2002

Page 8

**C. Claims 15, 16, 19 and 20 were rejected under 35 USC §103(a) as unpatentable over Gauthier in view of Suzuki.**

The rejection of claims 15, 16, 19 and 20 under 103(a) is traversed. Claims 15, 16, 19, and 20 have been cancelled, obviating the Examiner's rejection.

Withdrawal of the rejections to claims 15, 16, 19, and 20 is requested.

**D. Claims 15, 16, 19 and 20 were rejected under 35 USC §103(a) as unpatentable over either Japanese Patent 10,230,841, Inoue or Tobisawa in view of Suzuki.**

The rejections of claims 15, 16, 19, and 20 under 103(a) as unpatentable over any of the Japanese patent, Inoue, or Tobisawa in view of Suzuki is traversed.

Claims 15, 16, 19, and 20 have been cancelled, obviating the Examiner's rejection.

Withdrawal of the rejections to claims 15, 16, 19, and 20 is requested.

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January 21, 2004  
Docket No.: DP-301665 (7500/249)  
Serial No.: 10/052,240  
Filed: January 17, 2002  
Page 9

**E. Claims 21-28 are allowable if rewritten to comply with 35 U.S.C. §112 second paragraph and rewritten in independent form.**

The objection to claims 21-28 is traversed. Claims 21-28 have been cancelled, obviating the Examiner's objection.

Withdrawal of the objections to claims 21-28 is requested.

**F. New claims 29-49 are patentable over the prior art**

Applicant has added new claims 29-49, and the new claims are patentable over the prior art because the prior art, alone or in combination does not disclose, teach or suggest each and every element of the claimed invention.

Endo or Levrai in view of Suzuki fails to teach or suggest at least a first and second piston bearing surface. Additionally, Endo or Levrai in view of Suzuki fails to teach or suggest a "deformable reaction disc interposed between the piston and the flat head, said reaction disc disposed within a sleeve and held within the sleeve by an annular flange, the flange including a central orifice and forming a sleeve bearing surface axially separated from the second piston bearing surface when the assembly is in the first braking state and the sleeve bearing surface not axially separated from the second piston bearing surface when the assembly is in the second braking state, and wherein movement of the assembly from the first braking state to the second braking state deforms the reaction disc, said deformation absorbed by a distance between an internal surface of the disc and the annular flange." At most, Endo teaches a reaction disc interposed between the plunger and the reaction rod and Levrai teaches a disc directly abutting the reaction rod, and Levrai teaches a piston with a stepped bore pressing a belleville washer against the disc. While Suzuki teaches a deformable disk, the combination of references fails to teach or suggest each and every claimed element of claim 29, and therefore claim 29 is patentable over the combination. Claims 30-39 depend directly or indirectly from claim 29 and are therefore allowable over Endo or Levrai in view

January 21, 2004  
Docket No.: DP-301665 (7500/249)  
Serial No.: 10/052,240  
Filed: January 17, 2002  
Page 10

of Suzuki for at least the same reasons. Claims 40 and 49 likewise requires that the disc be interposed between the flat head and the piston, and therefore is patentable over Endo or Levrai in view of Suzuki for at least the same reasons. Claims 41-48 depend directly or indirectly from claim 40 and are therefore allowable over Endo or Levrai in view of Suzuki for at least the same reasons.

Likewise, none of Gauthier, Tobisawa, or Japan 10,230,841 teach or suggest that the disc be interposed between the flat head and the piston and therefore claims 29-49 are patentable over the references for at least the same reasons.

In addition, claim 49 incorporates "means for" language and is intended to be construed under 35 U.S.C 112 paragraph 6, requiring reference to the specification, and allowing the broadest reasonable interpretation of the disclosure.

January 21, 2004  
Docket No.: DP-301665 (7500/249)  
Serial No.: 10/052,240  
Filed: January 17, 2002  
Page 11

**CONCLUSION**

Examiner Lopez's rejections of claims 15-28 have been obviated by cancellation. Applicant has fully supported that new claims 29-49 fully satisfy the requirements of 35 U.S.C. §§102, 103 and 112, as well as 37 CFR 1.126. In view of the foregoing, favorable consideration and early passage to issue of the present application is respectfully requested.

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Respectfully submitted,  
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